

[Parties and Counsel Listed on Signature Pages]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

Leslie and Jessica Smith

Member Case No.: 4:23-CV-05632

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STIPULATION AND
[PROPOSED] ORDER RE FILING
PUBLIC VERSION OF ORDER RE
PRIVILEGE ASSERTION RE TWO
DOCUMENTS CLAWED BACK BY
PLAINTIFF JESSICA SMITH**

Re: ECF No. 1838

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's April 4, 2025 Order Re Privilege Assertion Re Two Documents Clawed Back by Plaintiff Jessica Smith ("Order") (ECF No. 1838), the Parties, through their undersigned counsel, hereby stipulate and agree to the public filing of the Order with the following proposed redactions:

- Redact quote at page 5, line 12.
- Redact quote at page 5, line 14.
- Redact quote at page 5, line 15.
- Redact quote at page 5, line 16.
- Redact quote at page 5, line 21.
- Redact quote at page 5, line 23.

- Redact quote at page 5, line 23.
- Redact document description at page 8, line 14.
- Redact quote at page 10, line 28.
- Redact quote at page 11, line 1.

For all redactions other than the redacted quote at page 11, Defendants agree to the proposed redactions for the limited purpose of this Order and only to the extent they refer to information or deposition testimony that has been marked confidential before bellwether trial selection. Also for all redactions other than the redacted quote at page 11, Defendants reserve all rights to challenge the confidentiality or claims of privilege of the redacted information and deposition testimony after bellwether trial selection.

Pursuant to the Order, the proposed redacted version of the Order is attached as Exhibit A.

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: May 2, 2025

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ATTESTATION

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 2, 2025

By: /s/ Lexi J. Hazam
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